

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

CHRISTA McAULIFFE INTERMEDIATE
SCHOOL PTO, et al.,

Case No. 1:18-cv-11657(ER)(OTW)

Plaintiffs,

-against-

**DECLARATION OF
CHRISTOPHER M. KIESER**

BILL de BLASIO, in his official capacity as
Mayor of New York City, et al.,

Defendants.

I, Christopher M. Kieser, declare as follows:

1. I am an attorney representing the Plaintiffs in the above-captioned case. I am therefore personally familiar with the facts and circumstances of this case referenced herein. I submit this declaration in support of Plaintiffs' opposition to Defendants' motion for summary judgment.

2. Attached hereto as Exhibit 1 are excerpts of the deposition of Nadiya Chadha.

3. Attached hereto as Exhibit 2 are various exhibits to Ms. Chadha's deposition. Some of these exhibits were marked confidential pursuant to the protective order entered in this case, but Defendants have agreed that they do not have to be filed under seal.

4. Attached hereto as Exhibit 3 are relevant excerpts of the deposition of Defendants' expert Michael Scuello.

5. Attached hereto as Exhibit 4 are documents produced by Defendants in discovery, bates-stamped ChMc 4249 and 4250. These documents depict the cutoff scores for each specialized high school for both regular and Discovery admission under several scenarios,

including the fully implemented changes and what would have happened had the changes not been implemented.

6. Plaintiffs also reference the Demographic Snapshot, a publicly available database containing demographic information about New York City Department of Education schools. This Court has already taken judicial notice of a previous version of the Demographic Snapshot. *See Christa McAuliffe Intermediate Sch. PTO, Inc. v. de Blasio*, 364 F. Supp. 3d 253, 262 (S.D.N.Y. 2019). The version cited in Plaintiffs' opposition papers is located at <https://infohub.nyced.org/docs/default-source/default-document-library/demographic-snapshot-2016-17-to-2020-21-public.xlsx>.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, and that this declaration was executed on this 18th day of November, 2021, in Sacramento, California.



CHRISTOPHER M. KIESER